

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

FIRST JUDICIAL DISTRICT

Case Type: Other-Civil

Bay Side Recycling Company, LLC and AMG
Alliance LLC,

Court File No.: _____

Plaintiff,

NOTICE OF MOTION AND MOTION

v.

SKB Environmental, Inc., Gem-Ash
Processing LLC, 4G Group, LLC, Christopher
J. Goodwald, Matthew Goodwald and Jerry
Goodwald,

Defendants.

NOTICE OF HEARING

PLEASE TAKE NOTICE that, as soon as Plaintiffs Bay Side Recycling Company, LLC and AMG Alliance LLC (collectively, "Plaintiffs") can be heard before a Judge of the Dakota County District Court, Plaintiff, through counsel, will move for a temporary restraining order pursuant to Rule 65 of the Minnesota Rules of Civil Procedure.

MOTION

Plaintiff hereby moves, pursuant to Rule 65 of the Minnesota Rules of Civil Procedure, for a temporary restraining order as follows:

1. Enjoining C.J. Goodwald and Matthew Goodwald from appropriating for their personal benefits business opportunities properly belonging to Plaintiffs;
2. Enjoining Matthew Goodwald from violating his employment agreement with Bay Side;
3. Enjoining C.J. Goodwald and Matthew Goodwald from using or disclosing trade

secret, proprietary or confidential information learned during their employment with Plaintiffs;

4. Enjoining SKB, Gem-Ash, 4G Group, and Jerry Goodwald from using or disclosing trade secret, proprietary or confidential information learned by C.J. Goodwald or Matt Goodwald during their employment with Plaintiffs;

5. Enjoining SKB and Gem-Ash from entering into their proposed contract. Plaintiffs respectfully request the Court to order SKB to maintain its existing, unexpired contract with AMG Alliance until the Court has had an opportunity to rule on both this TRO Motion and a subsequent Motion for a Permanent Injunction; and

6. Ordering SKB to maintain its existing, unexpired contract with AMG Alliance until the Court has had an opportunity to rule on both this TRO Motion and a subsequent Motion for a Permanent Injunction.

Plaintiff's motion is based on Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order, the Affidavits of Laura N. Maupin, Michael Zweigbaum, and Thomas Rogers, and the exhibits attached thereto, the record and file before the court, and the arguments of counsel.

BARNES & THORNBURG LLP

Dated: October 23, 2014

By: s/Laura N. Maupin
Laura N. Maupin (MN #324942)
Erin E. Westbrook (#393072)
225 South Sixth Street, Suite 2800
Minneapolis, MN 55402
612-333-2111

Attorneys for Plaintiffs Bayside Recycling
Company, LLC & AMG Alliance LLC